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Liaison Counsel for Lead Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE ALLERGAN GENERIC DRUG
PRICING SECURITIES LITIGATION

Civil Action No. 2:16-9449 (SDW) (LDW)

**STIPULATION AND ~~PROPOSED~~ ORDER
SUBSTITUTING LEAD COUNSEL**

Lead Plaintiff Union Asset Management Holding AG (“Union”) respectfully submits this stipulation and proposed order with regard to the appointment of Lead Counsel in the above-captioned matter.

1. WHEREAS, the Private Securities Litigation Reform Act (“PSLRA”) requires the Lead Plaintiff to select and retain counsel to represent the class, subject to Court approval (*see* 15 U.S.C. § 78u-4(a)(3)(B)(v));

2. WHEREAS, on February 2, 2017, the Court appointed Union and Sjunde AP-Fonden (“AP7”) to serve as Lead Plaintiffs in this action;

3. WHEREAS, Union had selected Motley Rice LLC (“Motley Rice”) to represent it in this matter, and AP7 had selected Kessler Topaz Meltzer & Check, LLP (“Kessler Topaz”) to represent it in this matter;

4. WHEREAS, in accordance with those selections and the PSLRA, on February 2, 2017, the Court approved Lead Plaintiffs’ selection of counsel and appointed Motley Rice and Kessler Topaz as co-Lead Counsel for the class;

5. WHEREAS, Union has conducted an internal review of its active litigation, including its selection of Lead Counsel in this action;

6. WHEREAS, as part of that review, Union retained Bernstein Litowitz Berger & Grossmann LLP (“Bernstein Litowitz”) to represent it and the proposed class in this action, subject to the approval of the Court, and terminated its relationship with Motley Rice in this case;

7. WHEREAS, Motley Rice has agreed to withdraw as co-Lead Counsel, and Union seeks to substitute Bernstein Litowitz to serve as co-Lead Counsel with Kessler Topaz in this case;

8. WHEREAS, Motley Rice does not oppose the substitution of Bernstein Litowitz as co-Lead Counsel in this action;

9. WHEREAS, Kessler Topaz does not oppose the substitution of Bernstein Litowitz as co-Lead Counsel in this action;

10. WHEREAS, AP7 does not oppose the substitution of Bernstein Litowitz as co-Lead Counsel in this action;

11. WHEREAS, Bernstein Litowitz has significant experience serving as Lead Counsel in securities class actions and has a proven history of handling this type of complex litigation in this District and in courts throughout the Country (*see* Bernstein Litowitz's Firm Résumé, submitted herewith as Exhibit A to the accompanying Declaration of James E. Cecchi);

12. WHEREAS, on May 15, 2017 counsel for Union—Bernstein Litowitz—contacted counsel for Defendants regarding substitution of counsel and, to date, no Defendant has indicated its opposition to the relief sought herein;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

1. Union's selection of Bernstein Litowitz to serve as co-Lead Counsel along with Kessler Topaz in the above-captioned action is approved.

2. Motley Rice is withdrawn as co-Lead Counsel in the above-captioned matter.

Dated: May 16, 2017

Respectfully submitted,

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.**

/s/ James E. Cecchi

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Liaison Counsel for Lead Plaintiffs

Dated: May 16, 2017

/s/ John C. Browne

John C. Browne

(*pro hac vice* application forthcoming)

Jeroen van Kwawegen

(*pro hac vice* application forthcoming)

Lauren M. Ormsbee

(*pro hac vice* application forthcoming)

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(*pro hac vice* application forthcoming)

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*Counsel for Lead Plaintiff Union Asset
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Dated: May 16, 2017

/s/ Matthew L. Mustokoff

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*Counsel for Lead Plaintiff Sjunde AP-
Fonden and Co-Lead Counsel for Lead
Plaintiffs and the Class*

Dated: May 16, 2017

/s/ William H. Narwold

William H. Narwold

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PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Dated: May 17, 2017



HON. SUSAN D. WIGENTON
UNITED STATES DISTRICT JUDGE